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IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

2005 AUG -2 A 10: 50

SHIRLEY Z. LEE,
DEBRA P. LACROIX, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
PLAINTIFF, LA

VS.

COMPASS BANCSHARES, INC.,

DEFENDANT.

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CASE NO.: 1:05cv717.B

A JURY IS DEMANDED

COMPLAINT

I. INTRODUCTION

1. This is an action for declaratory judgment, equitable relief, and money damages, instituted to secure the protection of and to redress the deprivation of rights secured through the Civil Rights Act of 1866, as amended by Section 101 of the Civil Rights Act of 1991, and codified as 42 U.S.C. Section 1981, and 42 U.S.C. Section 1981a, which provide for relief from racial discrimination in employment.

II. JURISDICTION

2. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. Sections 1331, 1343(4); 28 U.S.C. Sections 2201 and 2202.

3. The unlawful employment practices alleged herein below were committed by the Defendant within Houston County, Alabama. Venue is proper under 28 U.S.C. Section 1391(b).

III. PARTIES

Plaintiff is a Naturalized American born in China and residing in the Middle District at all times pertinent. To the extent that "Asian" is a racial category, Plaintiff is of the Asian race. Defendant is primarily a bank-holding corporation headquartered in Birmingham, Alabama but also owns insurance agencies and a wealth management firm. It operates in eight Southern and Southwestern states and specifically the Middle District of Alabama (Barbour/Houston Counties).

IV STATEMENT OF ALLEGATIONS

4. Plaintiff began working for the Defendant on April 1, 2001 as a teller and was terminated on January 28, 2005;

5. Plaintiff was terminated allegedly for an error that white tellers made routinely but aren't so terminated;

6. During the course of her employment, Plaintiff applied for positions/promotions that she was qualified to get but each time was passed over for a less or equally qualified white female;

7. The Defendant's agents, Plaintiff's supervisor, disciplined her in a manner not used to discipline white employees and which was humiliating and insulting;

8. Management at Plaintiff's place of employment (Dothan Main Branch) habitually treated any minority - - African-American, Asian-American - - different than the treatment whites received;

9. The Defendant has no minority managers or executives and purposely engages in conduct designed to prevent minorities from advancing so that he/she can move into the executive ranks.

V. CLAIMS FOR RELIEF

11. Plaintiff requests that the Defendant be ordered to permanently cease and desist from all race discrimination and national origin discrimination in employment;

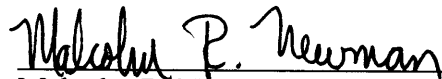
12. Plaintiff prays this Court will order the Defendant to institute policies for the recruitment of and training for minorities that will allow any qualified minority to gain employment with Defendant and be placed in a career track that could lead to the Executive level;

13. Plaintiff claims that the Defendant's conduct has caused her pain, humiliation, suffering and financial loss for which he seeks compensatory damages of \$5,000,000.00 (five million dollars);

14. Plaintiff seeks punitive damages of \$10,000,000.00 (ten million dollars) from this Defendant in that it knew or should have known that its actions were violations of long standing law and purposefully pursued this unlawful course.

15. Any and all other relief, including attorney's fees and costs to which she may be entitled.

Malcolm R. Newman, Attorney, P.C.



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